

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

No.

Plaintiff,

**VERIFIED COMPLAINT FOR
FORFEITURE *IN REM***

v.

\$122,128.25 SEIZED FROM WELLS
FARGO BANK, N.A. ACCOUNT NO.
*****2193, IN THE NAME OF NAMIT
CHAWLA,

Defendant.

COMES NOW Plaintiff United States of America, by and through the undersigned
counsel, pursuant to Rule G of the Supplemental Rules for Admiralty or Maritime Claims
and Asset Forfeiture Actions, and alleges:

I. NATURE OF ACTION

1. This is a complaint for the forfeiture *in rem* of \$122,128.25 Seized From Wells
Fargo Bank, N.A. Account No. *****2193, In The Name Of Namit Chawla ("Defendant
Currency"), which is hereby alleged to constitute property involved in a violation of 31
U.S.C. § 5324, or conspiracy to commit such violation, and property traceable to such
violation or conspiracy, and is therefore subject to civil forfeiture pursuant to 31 U.S.C. §
5317(c)(2) and 18 U.S.C. § 984.

VERIFIED COMPLAINT FOR FORFEITURE *IN REM* 1
U.S. v. \$122,128.25 Seized From Wells Fargo Bank, N.A.
Acct. No. *****2193, In the Name of Namit Chawla

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5200
SEATTLE, WASHINGTON 98101
(206) 553-7970

II. JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1345 and 1355, and 31 U.S.C. § 5317(c)(2).

3. This Court has venue pursuant to 28 U.S.C. § 1395.

III. DEFENDANT PROPERTY

4. The Defendant Currency is now, and during the pendency of this action will be, within the jurisdiction of this Court.

5. The Defendant Currency was seized on March 28, 2014, pursuant to a federal seizure warrant issued on the same date. Case No. 2:14-ms-027-MAT.

6. The Defendant Currency is now in the custody of the United States Department of the Treasury, Internal Revenue Service ("IRS").

IV. FACTUAL BASIS FOR FORFEITURE

7. The facts supporting forfeiture of the Defendant Currency are set forth in the Affidavit of IRS Task Force Officer Ryan R. Raulerson, which is filed herewith and incorporated herein by this reference. Exhibit 1.

V. LEGAL BASIS FOR FORFEITURE

8. By reason of the foregoing, there is probable cause to believe that the Defendant Currency is property involved in structured transactions in violation of 31 U.S.C. § 5324(a)(3), or conspiracy to commit such violation, and property traceable to such violation or conspiracy, and is therefore subject to forfeiture to the United States pursuant to 31 U.S.C. § 5317(c)(2) and 18 U.S.C. § 984.

WHEREFORE, the United States prays as follows:

A. That due notice be given to all interested persons to appear and show cause why forfeiture of the Defendant Currency should not be decreed;

B. That judgment be entered declaring the Defendant, \$122,128.25 Seized From Wells Fargo Bank Account No. *****2193, In The Name Of Namit Chawla, forfeited to the United States for disposition according to law;

1 C. That the Court thereafter order the IRS, or its contractor, to dispose of the
2 Defendant Currency as provided by law; and

3 D. That the United States be granted such other and further relief as this Court
4 may deem just and proper, together with the costs and disbursements of this action.

5 DATED this 3rd day of April, 2014.

6 Respectfully submitted,

7 JENNY A. DURKAN
8 United States Attorney

9
10 RICHARD E. COHEN
11 Assistant U.S. Attorney
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VERIFICATION OF COMPLAINT

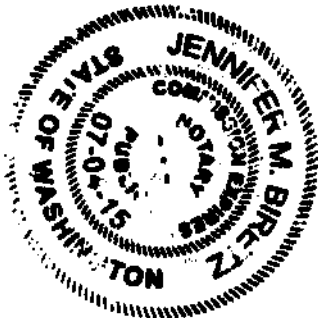
STATE OF WASHINGTON)
) ss
 COUNTY OF KING)

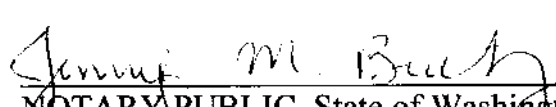
I, Ryan R. Raulerson, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

I am a Task Force Officer with the United States Department of the Treasury, Internal Revenue Service, and am assigned to this case. I have read the attached Complaint and know the contents thereof; I furnished the information contained in the Complaint based upon my own investigation and that of other reliable official Government sources; and based upon information and belief, the allegations contained in the Complaint are true.


 RYAN R. RAULERSON, Task Force Officer
 Internal Revenue Service

SUBSCRIBED and SWORN to before me this 3rd day of April, 2014.




 NOTARY PUBLIC, State of Washington
 My Commission expires: 7/4/15